

ISACCO JACKY SAADA

Petitioner,

VS.

NARKIS GOLAN

Respondent.

No. 18-CV-05292

**PETITIONER’S MOTION TO (1) REPLACE OR ADD MORIN GOLAN AS
RESPONDENT, (2) VACATE KINGS COUNTY FAMILY COURT ORDERS, AND (3)
TRANSFER B.A.S. INTO MR. SAADA’S CARE**


Petitioner Jacky Saada, by and through counsel respectfully submits this motion, and for the reasons set forth in the accompanying memorandum, hereby moves that the Court enter an order:

1. Pursuant to Federal Rule of Civil Procedure 25, replacing Respondent Narkis Golan with new respondent Morin Golan, along with any other individual wrongfully retaining B.A.S. in the United States; or in the alternative, pursuant to Federal Rule of Civil Procedure 15, granting leave to amend the petition and adding Morin Golan along with any other individual wrongfully retaining B.A.S. in the United States as Respondents.
2. Vacating the ex parte temporary custody order issued by the Kings County Family Court on November 15, 2022 granting Morin Golan temporary custody of B.A.S.; and
3. Vacating the ex parte temporary order of protection issued by the Kings County Family Court issued on November 15, 2022 in favor of Morin Golan and B.A.S. against Mr. Saada.

4. Directing that B.A.S. be returned to Mr. Saada's care in New York during the pendency of this litigation.

Dated: December 9, 2022
New York, New York

Respectfully submitted,



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cc: All counsel of record (by ECF)